

**Remarks**

Claims 1-16 are pending in this application. Claims 1 and 6-8 have been amended for clarification.

**35 U.S.C. § 102, Anticipation**

Claims 1-5, 8-13 and 16 stand rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent No. 6,965,895 to Smith ("Smith"). Applicants traverse this rejection because the asserted reference fails to disclose or suggest recited elements and steps of the rejected claims.

The asserted reference is directed to a system for gathering data in a circuit chip fabrication facility and for performing detailed analysis on that data. Applicants note that Smith does not disclose or suggest a system using an "inserter controller" or a method for gathering "inserter machine" data, as recited in independent claims 1 and 9. The nature of the inserter controller and machine are significant in that the manner of handling and processing data gathered by such components is different than in the circuit manufacturing industry.

Another significant difference is that Smith does not disclose or suggest the "data pump" element for, or step for, "processing compressed data from the journal and transmitting the processed data in a format suitable for a particular client."

Smith provides elaborate techniques for processing the data, and further provides means for "providing access to the results." See e.g. Claim 1 of Smith. In contrast, the "data pump" element, and "processing" and "transmitting" steps affirmatively push the desired data to the client.

This feature is described in the present application:

The data pump 2 takes responsibility for making sure that the correct data is transmitted to the clients 4. This arrangement relieves the responsibility of retrieving data from the clients 4. Since clients 4 may be comprised of a variety of different types of applications, without the data pump 2 it would be difficult to ensure that the clients 4 were reliably receiving information. Data pump 2 includes client drivers 8 and data link 9 to facilitate providing the individualized data needs to each of the clients 4. Each client driver 8 ensures that the data is properly transmitted from the data pump 2. Some clients 4

may receive information in a format suitable for a database, while others may receive text information. Data pump 2 ensures that the information is transmitted in the format most easily understood by the client 4. Data pump 2 can provide journal data for all mail runs, and clients 4 can receive data for status changes as they happen.

See page 8, lines 6-17.

Accordingly, it is submitted that these § 102(e) rejections should be withdrawn.

35 U.S.C. § 103, Obviousness

Claims 6-7 and 14-15 stand rejected under 35 U.S.C. § 103(a) as obvious over Smith in further view of U.S. Patent No. 6,990,497 to O'Rourke ("O'rourke"). O'Rourke is directed to a system for dynamic streaming media management, and does not cure deficiencies identified above with respect to Smith. Further, there is no suggestion to combine the disclosure of O'Rourke with the disclosure of Smith to create anything covered by the rejected claims. Accordingly it is requested that these rejections be withdrawn.

Conclusion

It is respectfully submitted this application is in a condition for allowance. Please contact the undersigned representative if there are any questions regarding this application.

Respectfully submitted,



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